

ERM-North Central, Inc.

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February 24, 1995

Ms. Mary Tierney
U.S. Environmental Protection Agency
77 West Jackson Boulevard
HSRL-6J
Chicago, IL 60604-3590



RE: Lenz Oil Site
Your letter of February 22, 1995

EPA Region 5 Records Ctr.



207050

Dear Ms. Tierney:

In response to the subject letter, we would like to clarify a couple of issues. First, regarding points (2) & (4) of the letter, there appears to have been a misunderstanding during our telephone conversation of February 22, 1995. Section 3.0 of the revised Feasibility Study (FS) will include a screening of the three options listed under the column for remedial activity related to soil excavation as well as the three options listed under the column for remedial activity for recovery of the light nonaqueous phase liquid (LNAPL). The screening process utilized in Section 3.0 will include an evaluation of all options for each of the three remedial activities related to soil excavation and LNAPL recovery. This screening will result in the selection of one option for each of these remedial activities that merits further evaluation. As a result of this screening process, only one option within each of these remedial activity groups will be evaluated in detail in Section 4.0 of the FS.

As described in our comments on the Baseline Risk Assessment, which were provided to you on January 24, 1995, the risk calculations were incorrect, and there are no unacceptable risks posed by the site soils. Therefore, the discussion of the site conditions presented in Section 1.0 of the FS Revision 1 will describe our conclusions that there are no soils requiring remediation based on the Baseline Risk Assessment. Additionally, costs for dealing with such features are very much dependent upon volume and location, as well as potential interaction with or effect upon other response actions. As such, simple incremental cost analysis will not be accurate. In summary, with regard to point (3), the current array of alternatives as well as the Revision 1 to the FS, currently in process, will not include an evaluation of soil remedies based on the Baseline Risk Assessment. Instead, as shown in the array of alternatives that we previously sent, soil remediation will be evaluated only for areas where LNAPL is present at the water table.

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We are proceeding with the preparation of the revised FS based on the alternatives previously presented to you, as clarified herein. If you do not agree with the alternatives as presented, please call me so that we may arrange a meeting to resolve the issues and to postpone the FS Revision 1 due date, if necessary.

Very truly yours,

ERM-NORTH CENTRAL, INC.



for John P. Imse, P.G.
Principal

nrw

cc: Eugene Bernstein
Alan Bielawski
Diane Richardson
Kathy Shrawder